

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI**

IN RE: KATHERINE THOMAS, Debtor

**Case No. 17-10697-SDM
CHAPTER 13**

MOTION TO RECONSIDER

COMES NOW, Thomas C. Rollins, Jr., attorney for Morgan & Morgan (“Special Counsel”), and files this Motion to Reconsider and in support thereof, would show to this Honorable Court as follows, to-wit:

1. This Court has jurisdiction over this matter pursuant to 28 U.S.C. § 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b).
2. On or about December 8, 2022 an Order was entered by this Court (dk # 84) employing Morgan & Morgan as Special Counsel representing Debtor in a personal injury claim.
3. On or about February 3, 2023 an Order was entered by this Court (dk # 100) approving the settlement of the personal injury claim.
4. That Debtor subsequently was billed by UMMC for \$409.26, representing the deductible for medical services for treatment of injuries sustained from this claim.
5. Special Counsel requests that the previous Order (Dk #100) be set aside and a new Order be entered granting settlement approval and authority to disburse the claim proceeds as follows:
 - a. Attorney's Fees \$8,750.00
 - b. Expenses: \$41.76
 - c. Payment to UMMC: \$409.26
 - d. Amount to Trustee for Distribution in Debtor's case: \$15,798.98

WHEREFORE, the undersigned requests that this Motion be received and filed and that an Order be entered approving the foregoing settlement and distribution of proceeds, and prays for such other, further, and general relief to which the Special Counsel may be entitled.

Respectfully submitted,

Morgan & Morgan

BY: /s/ Thomas C. Rollins, Jr.

Thomas C. Rollins, Jr. (MSBN 103469)
Jennifer A Curry Calvillo (MSBN 104367)
The Rollins Law Firm, PLLC
P.O. Box 13767
Jackson, MS 39236
601-500-5533

CERTIFICATE OF SERVICE

I, Thomas C. Rollins, Jr., do hereby certify that a true and correct copy of the above and foregoing Motion to Approve a Settlement, Compensate Special Counsel and Authorize Distribution of Proceeds with Debtor was forwarded on February 23, 2023 to:

By Electronic CM/ECF Notice:

Chapter 13 Case Trustee

U.S. Trustee

/s/ Thomas C. Rollins, Jr.

Thomas C. Rollins, Jr. (MSBN 103469)

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF MISSISSIPPI

IN RE:
KATHERINE THOMAS

CASE NO: 17-10697

**DECLARATION OF MAILING
CERTIFICATE OF SERVICE**

Chapter: 13

On 2/23/2023, I did cause a copy of the following documents, described below,

Motion to Reconsider

to be served for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.

I caused these documents to be served by utilizing the services of BK Attorney Services, LLC d/b/a certificateofservice.com, an Approved Bankruptcy Notice Provider authorized by the United States Courts Administrative Office, pursuant to Fed.R.Bankr.P. 9001(9) and 2002(g)(4). A copy of the declaration of service is attached hereto and incorporated as if fully set forth herein.

Parties who are participants in the Courts Electronic Noticing System ("NEF"), if any, were denoted as having been served electronically with the documents described herein per the ECF/PACER system.

DATED: 2/23/2023

/s/ Thomas C. Rollins, Jr
Thomas C. Rollins, Jr 103469

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PO Box 13767
Jackson, MS 39236
601 500 5533
trollins@therollinsfirm.com

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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF MISSISSIPPI

IN RE:
KATHERINE THOMAS

CASE NO: 17-10697

**CERTIFICATE OF SERVICE
DECLARATION OF MAILING**

Chapter: 13

On 2/23/2023, a copy of the following documents, described below,

Motion to Reconsider

were deposited for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.

The undersigned does hereby declare under penalty of perjury of the laws of the United States that I have served the above referenced document(s) on the mailing list attached hereto in the manner shown and prepared the Declaration of Certificate of Service and that it is true and correct to the best of my knowledge, information, and belief.

DATED: 2/23/2023



Jay S. Jump
BK Attorney Services, LLC
d/b/a certificateofservice.com, for
Thomas C. Rollins, Jr
The Rollins Law Firm, PLLC
PO Box 13767
Jackson, MS 39236

USPS FIRST CLASS MAILING RECIPIENTS:

Parties whose names are struck through were not served via First Class USPS Mail Service.

CASE INFO

LABEL MATRIX FOR LOCAL NOTICING
05371
CASE 17-10697-SDM
NORTHERN DISTRICT OF MISSISSIPPI
ABERDEEN
THU FEB 23 11-51-04 CST 202

EXCLUDE

~~LOCKE D BARKLEY~~
~~6360 155 NORTH~~
~~SUITE 140~~
~~JACKSON MS 39211-2038~~

MICHAEL W BOYD
BOYD LAW OFFICE PA
PO BOX 1586
GREENVILLE MS 38702-1586

C SPIRE
1018 HIGHLAND COLONY PKWY SUITE 300
RIDGELEY MS 39157-2068

(P) CAPITAL ONE
PO BOX 30285
SALT LAKE CITY UT 84130-0285

CAPITAL ONE
ATTN GENERAL CORRESPONDENCEBANKRUPTCY
PO BOX 30285
SALT LAKE CITY UT 84130-0285

CARDWORKSCW NEXUS
ATTN BANKRUPTCY
PO BOX 9201
OLD BETHPAGE NY 11804-9001

CHASE RECEIVABLES
1247 BROADWAY
SONOMA CA 95476-7503

CREDIT ONE BANK NA
PO BOX 98873
LAS VEGAS NV 89193-8873

CREDIT PLAN OF GREEN
1701B STRONG AVENUE
GREENWOOD MS 38930

CREDIT PLAN OF GREENWOOD
1701B STRONG AVENUE
GREENWOOD MS 38930

(P) DIRECTV LLC
ATTN BANKRUPTCIES
PO BOX 6550
GREENWOOD VILLAGE CO 80155-6550

FACNAB
480 JAMES ROBERTSON PKWY
NASHVILLE TN 37219-3019

FED LOAN SERVICING
PO BOX 69184
HARRISBURG PA 17106-9184

(P) HEIGHTS FINANCE DBA FIRST HERITAGE
ATTN FH BK
PO BOX 1947
GREENVILLE SC 29602-1947

FIRST TOWER LOAN LLC
PO BOX 320001
FLOWOOD MS 39232-0001

(P) GRAND CANYON UNIVERSITY
ATTN ATTN OFC OF GENERAL COUNSEL
PO BOX 11097
PHOENIX AZ 85061-1097

HAROLD REED II
2006 KILDARE STREET NW
HUNTSVILLE AL 35811-1814

LVNV FUNDING LLC ITS SUCCESSORS AND
ASSIGNS
ASSIGNEE OF FNBM LLC
RESURGENT CAPITAL SERVICES
PO BOX 10587
GREENVILLE SC 29603-0587

LEND UP
237 KEARNEY ST 372
SAN FRANCISCO CA 94108-4502

MERRICK BANK
RESURGENT CAPITAL SERVICES
PO BOX 10368
GREENVILLE SC 29603-0368

MERRICK BANK CORP
PO BOX 9201
OLD BETHPAGE NY 11804-9001

MIDLAND FUNDING LLC
MIDLAND CREDIT MANAGEMENT INC AS
AGENT FOR MIDLAND FUNDING LLC
PO BOX 2011
WARREN MI 48090-2011

MORGAN MORGAN
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STE 200
JACKSON MS 39211-5991

NETWORK COLLECTION S
P O BOX 1725
HATTIESBURG MS 39403-1725

NISSAN
POB 660366
DALLAS TX 75266-0366

NISSAN MOTOR ACCEPTANC
PO BOX 660360
DALLAS TX 75266-0360

USPS FIRST CLASS MAILING RECIPIENTS:

Parties whose names are struck through were not served via First Class USPS Mail Service.

NISSAN MOTOR ACCEPTANCE
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PRA RECEIVABLES MANAGEMENT LLC
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SMITH ROUCHIN ASSOCIATES
SRA
1456 ELLIS AVE
JACKSON MS 39204-2204

SYNCHRONY BANK JC PENNEYS
ATTN BANKRUPTCY
PO BOX 956060
ORLANDO FL 32896-0001

DEBTOR

KATHERINE THOMAS
6949 ROSEBANK MOUNT OLIVE ROAD
LEXINGTON MS 39095-8401

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(P) TOWER LOAN
P O BOX 320001
FLOWOOD MS 39232-0001

TOWER LOAN OF LEXINGTON
PO BOX 32067
FLOWOOD MS 39232

EXCLUDE

U S TRUSTEE
501 EAST COURT STREET SUITE 6430
JACKSON MS 39201-5022

US DEPARTMENT OF EDUCATION
CO FEDLOAN SERVICING
PO BOX 69184
HARRISBURG PA 17106-9184

VERIZON
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4515 N SANTA FE AVE
OKLAHOMA CITY OK 73118-7901

GREGORY J WALSH
THE SUNDMAKER FIRM LLC
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NEW ORLEANS LA 70115-2357

WORLD OMNI FINANCIAL
6150 OMNI PARK DR
MOBILE AL 36609-5195

WORLD OMNI FINANCIAL CORP
1027 NINTH STREET
NEW ORLEANS LA 70115-2357

WORLD OMNI FINANCIAL CORP ITS SUCCESSOR
AND
ASSIGNS
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323 W LAKESIDE AVE SUITE 200
CLEVELAND OH 44113-1009